



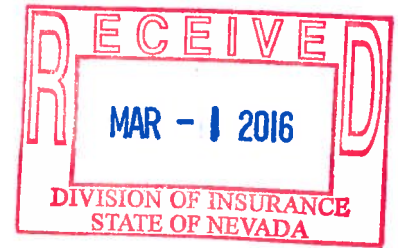
Nevada Advocates for Planned Parenthood Affiliates, Inc.

To: Commissioner, Nevada Division of Insurance

From: Elisa Cafferata, President & CEO

Re: Proposed Regulation LCB R049-14 regarding:  
Network Adequacy and Essential Community Providers (ECP)

Date: February 29, 2016



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Thank you for the opportunity to comment on the proposed regulation LCB R049-14 dated October 19, 2015.

Nevada Advocates (NAPPA) is the independent advocacy, lobbying, and election organization representing the Planned Parenthood affiliates operating in Nevada. The state's three health centers offer high quality, reasonably priced, confidential and nonjudgmental care to over 28,000 unique patients each year. Our mission is to improve access to health care while protecting our patients' privacy, health and safety. We offer extensive education programs throughout the state to empower young people to make healthy and responsible choices.

We have provided comments and testimony in the past in support of a robust Essential Community Provider standard that includes all willing essential community providers.

We understand and support the concept of creating Network Adequacy Advisory Council. At the same time, we are concerned that this proposed regulation eliminates the clear protections for Essential Community Providers outlined in federal guidance.

Therefore, we urge you to consider keeping the specific protections of (the old) Sec. 20, subsections 1 through 3 that outline the federal requirements for Essential Community Providers.

Thank you for your consideration.

Submitted by:  
Elisa Cafferata, President & CEO NAPPA  
550 W. Plumb Lane c/o UPS Mail #B-104, Reno, NV 89509  
[info@NevadaAdvocates.org](mailto:info@NevadaAdvocates.org) 775-412-2087